

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION  
IN ADMIRALTY

TIFFANY N. PROVENCE, as the Personal  
Representative of the Estate of Juan Antonia  
Villalobos Hernandez,

Plaintiff,

vs

UNITED STATES OF AMERICA,  
CROWLEY MARITIME CORPORATION,  
CROWLEY GOVERNMENT SERVICES,  
INC., DETYENS SHIPYARDS, INC., and  
HIGHTRAK STAFFING, INC. d/b/a  
HITRAK STAFFING, INC.

Defendants.

C/A No. 2:21-cv-00965-RMG

**AFFIDAVIT OF JEREMY THORNTON**

PERSONALLY APPEARED BEFORE ME, Jeremy Thornton, who after being duly sworn, deposes and says:

- 1) My name is Jeremy Thornton.
- 2) I am over the age of eighteen and I have personal knowledge of the matters stated herein.
- 3) I am and was a Hull Department Quartermen for Detyens Shipyards, Inc. (“Detyens”) at all times relevant to this matter and am acting on behalf of Detyens Shipyards, Inc.
- 4)
- 5) While working at Detyens Shipyards, Mr. Hernandez wore a badge which indicated that he was working for Hitrak.
- 6) While working at Detyens Shipyards, Mr. Hernandez used the welding tools, machinery, and personal protective equipment provided to him by Detyens.

7) Upon information and belief, just as it did on the USNS LUMMUS, the Detyens Rigging Department had been restraining davit arms using a 3/8 inch wire rope and Crosby clamps in the same way without incident for over twenty years.

FURTHER DEPONENT SAYETH NOT.

Jeremy T. Thornton  
Jeremy Thornton

SWORN TO AND SUBSCRIBED before me  
this 15<sup>th</sup> day of July, 2022.

Nancy J. Henry  
NOTARY PUBLIC FOR South Carolina  
MY COMMISSION EXPIRES: Oct 12, 2031

